

**From:** [James Craig](#)  
**To:** [Gerald Kucia](#); [Wilson Minor](#)  
**Cc:** [Emily Washington \(emily.washington@macarthurjustice.org\)](#); [Stacy Ferraro](#); [McDonald, Mark R.](#); [Merrida Coxwell](#); [jamesldavisiii@aol.com](#); [NAldrich@schwabe.com](#); [vicarroll@gmail.com](#)  
**Subject:** Non-Pseudonymous Depositions in Jordan v Cain, No. 3:15-cv-295-HTW-LGI  
**Date:** Tuesday, August 23, 2022 3:25:00 PM  
**Importance:** High

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Gerald and Wilson,

As you know, in addition to the depositions of witnesses identified with pseudonyms, the Court has also granted Plaintiffs leave to depose witnesses whose names have been disclosed by Defendants during the discovery process. Thus, we plan to depose the following witnesses: former Commissioner Pelicia Hall, former Interim Commissioner Tommy Taylor, current Commissioner Burl Cain, and the current MSP Superintendent, Marc McClure. Also, we have previously noticed a 30(b)(6) deposition of MDOC, and will be sending you a revised notice to that effect.

Please let us know when these depositions can be scheduled.

Regards,

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